

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROTHSCHILD MOBILE IMAGING
INNOVATIONS, LLC,

Plaintiff,

v.

MITEK SYSTEMS, INC.,
JPMORGAN CHASE & CO. and
JPMORGAN CHASE BANK, N.A.,

Defendants.

C.A. No. 14-617-GMS

JURY TRIAL DEMANDED

ROTHSCHILD MOBILE IMAGING
INNOVATIONS, LLC,

Plaintiff,

v.

BANK OF AMERICA CORPORATION,
BANK OF AMERICA, N.A.,
NCR CORPORATION and
MITEK SYSTEMS, INC.,

Defendants.

C.A. No. 14-1142-GMS

JURY TRIAL DEMANDED

ROTHSCHILD MOBILE IMAGING
INNOVATIONS, LLC,

Plaintiff,

v.

CITIGROUP INC., CITIBANK, N.A.,
NCR CORPORATION and
MITEK SYSTEMS, INC.,

Defendants.

C.A. No. 14-1143-GMS

JURY TRIAL DEMANDED

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ROTHSCHILD MOBILE IMAGING
INNOVATIONS, LLC,

Plaintiff,

V.

WELLS FARGO & COMPANY,
WELLS FARGO BANK, N.A., FISERV, INC.
and MITEK SYSTEMS, INC.,

Defendants.

C.A. No. 14-1144-GMS

JURY TRIAL DEMANDED

DECLARATION OF LEIGH M. ROTHSCHILD

I, Leigh M. Rothschild, hereby declare as follows:

1. I am the Managing Director of Plaintiff Rothschild Mobile Imaging Innovations, LLC (“RMII”) in the above-captioned cases. I am more than 21 years old, and am competent to make this declaration. All of the statements set forth herein are true and correct and are based on my personal knowledge or a reasonable investigation of records sufficient to support the statements. I am also the inventor of the patents in suit.

2. On December 14, 2015, I participated in a call with Jim DeBello, who I understood was the CEO of Mitek Systems, Inc. (“Mitek”). The purpose of the call was to determine whether the parties were amenable to settlement.

3. When I declined Mitek's settlement offer, Mr. DeBello became very emotional and agitated and raised his voice to an unprofessional level. To the best of my recollection, Mr. DeBello told me I was similar to a bank robber, should be ashamed of myself, and asserted that Mitek would beat us down in litigation.

WNR

I declare under penalty of perjury that the foregoing is true and correct on September 28,
2016.

A handwritten signature in black ink, appearing to be 'L. Rothschild', written in a cursive style.

Leigh M. Rothschild.